

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

PATRICK AKERLUND, *et al.*,

Plaintiff,

v.

ATLAS AIR, INC., *et al.*,

Defendants.

Case No. 1:22-cv-23519-KMM-LFL

THE PARTIES' EXPEDITED MOTION TO ENTER A JOINT STIPULATION

The Parties—Plaintiffs along with Defendants Atlas Air, Inc. (“Atlas”) and Flight Services International, Inc. (“FSI”)—hereby jointly move on an expedited basis for the Court to allow the Parties to enter a Joint Stipulation regarding Defendants’ obligations to respond to Plaintiffs’ Third Amended Complaint.

The Parties respectfully request a ruling from the Court on their Expedited Motion by October 31, 2023. The Parties seek a ruling by this date because without this ruling, Defendants, including dismissed-party FSI, would be required to file a duplicative and unnecessary motion to dismiss, addressing ten Counts of the Third Amended Complaint that this Court dismissed in its September 20, 2023 Order [ECF No. 73] and concerning Plaintiffs’ claims against Defendants that this Court determined it lacks personal jurisdiction over by November 1, 2023. The proposed Joint Stipulation will enable Defendant Atlas to only respond to one Count in the Third Amended Complaint and will obviate the need for Defendant FSI to respond at all.

A copy of the Parties’ proposed Joint Stipulation is attached as **Exhibit A**. And a proposed order granting the Expedited Motion and entering the Parties’ Joint Stipulation is attached as **Exhibit B**.

Dated: October 27, 2023

Respectfully submitted,

/s/ Michelle Hogan

Eliot Pedrosa
Florida Bar No. 182443
epedrosa@jonesday.com
Michelle Hogan
Florida Bar No. 1010992
mhogan@jonesday.com
JONES DAY
600 Brickell Avenue, Suite 3300
Miami, FL 33131
Telephone: (305) 714-9700
Facsimile: (305) 714-9799

Jonathan M. Linas (pro hac vice)
jlinas@jonesday.com
JONES DAY
110 N. Wacker Drive, Suite 4800
Chicago, IL 60606
Telephone: (312) 782-3939
Facsimile: (312) 782-8585

Alexander V. Maugeri (pro hac vice)
amaugeri@jonesday.com
JONES DAY
250 Vesey Street
New York, NY 10281
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

Attorneys for Defendant Atlas Air, Inc.

/s/ Matthew A. Green

Matthew A. Green
Florida Bar No. 1019717
matthew.green@csklegal.com
S. Jonathan Vine
Florida Bar No. 10966
jonathan.vine@csklegal.com
COLE SCOTT KISSANE, PA
222 Lakeview Avenue, Suite 120
West Palm Beach, Florida 33401
Telephone: (561) 383-9200
Facsimile: (561) 683-8977

Attorneys for Flight Services International LLC

s/ John M. Pierce

Anthony Frank Sabatini
Florida Bar No. 1018163
Sabatini Law Firm P.A.
726 Calabria Way
Howey in the Hills, FL 34737
Telephone: (352) 455-2928
Email: anthony@sabatinilegal.com

John M. Pierce (admitted *pro hac vice*)
John Pierce Law PC
21550 Oxnard Street
3rd Floor, PMB #172
Woodland Hills, CA 91637
Telephone: (213) 279-7846
Email: jpierce@johnpiercelaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 27, 2023, I electronically filed a true and correct copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to all parties at the email addresses on file with the Clerk of Court.

/s/ Michelle Hogan
Michelle Hogan

